

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WRI PALOMINO TRACE)	
INVESTORS, L.P.,)	
a Washington limited partnership,)	
)	
Plaintiff,)	No. 08 CV 4180
)	
v.)	
)	Judge James F. Holderman
PALOMINO TRACE, LLC, an Illinois)	
limited liability company;)	
GV DEVELOPMENT, LTD., an Illinois)	
corporation, LARGO PARTNERS II, LLC,)	
an Illinois limited liability company)	
GEORGE VENTURELLA and)	
TERRI VENTURELLA, Individuals,)	
)	

NOTICE OF FILING

To: Cornelius P. Brown
Carrie A. Dolan
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208 S. LaSalle Street, Suite 1860
Chicago, Illinois 60604
nbrown@cohonraizes.com

PLEASE TAKE NOTICE that on the 2nd day of September, 2008, the undersigned caused to be electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, **Plaintiff's Response To Motion For Extension Of Time To Answer Or Otherwise Plead Filed By George Venturella.**

Respectfully submitted,

WRI PALOMINO TRACE INVESTORS, L.P.

By: /s/ Lauren N. Nachinson
One of Its Attorneys

Faye B. Feinstein (ARDC No. 6186627)
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a Washington limited partnership,)	
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Plaintiff,)	No. 08 CV 4180
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corporation, LARGO PARTNERS II, LLC,)	
an Illinois limited liability company)	
GEORGE VENTURELLA and)	
TERRI VENTURELLA, Individuals,)	
)	
Defendants.)	

**PLAINTIFF'S RESPONSE TO MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD FILED BY
GEORGE VENTURELLA**

Now comes the Plaintiff, WRI Palomino Trace Investors, L.P. ("Plaintiff"), by and through its attorneys, Quarles & Brady LLP, and for its Response to Motion For Extension Of Time To Answer Or Otherwise Plead Filed by George Venturella, hereby states:

1. On July 23, 2008, Plaintiff filed a one count complaint (the "Complaint") against the parties listed above (the "Defendants") alleging a breach of contract. On August 5, 2008, the Complaint was served on all Defendants. The Defendants are all related parties.
2. Defendants' time within which to answer or otherwise plead to the Complaint expired on August 25, 2008.

3. On August 25, 2008, Defendant George Venturella ("Mr. Venturella"), by his counsel, filed a motion for extension of time to answer or otherwise plead to the Complaint (the "Motion"). In the Motion, Mr. Venturella asserts that (i) Plaintiff would not agree to the twenty-one day extension he requested, but rather would only agree to an eighteen-day extension, and (ii) Plaintiff would agree to the extension only if Defendants agree not to seek further extensions. Motion, ¶ 4.

4. Plaintiff does not object to the twenty-one day extension to answer or otherwise plead as requested by Mr. Venturella; however, as the email chain attached to the Motion shows, Plaintiff requests that all Defendants be required to answer or otherwise plead without any further extensions.

5. Plaintiff requested that the order include language prohibiting further extensions due to the fact that Defendants first breached their agreement with Plaintiff in December, 2007; Defendants were notified of their breach on April 16, 2008, and of Plaintiff's intention to pursue its remedies. *See*, Complaint, Exhibit F. Thus, all Defendants, including Mr. Venturella, were formally made aware that a lawsuit would be filed against them over four months ago. During the last four and a half months, they had more than sufficient time to hire counsel and develop their position.

6. Further, other than Mr. Venturella, none of the Defendants have answered the Complaint, filed appearances or contacted Plaintiff. Mr. Brown, Mr. Venturella's counsel, has only filed an appearance on behalf of Mr. Venturella, and, as of the date he filed the Motion, did not represent any of the other Defendants, although he purports to request extensions on their behalf as well. Plaintiff is concerned that following the twenty-one day extension requested, Defendants will only then retain Mr. Brown or other

counsel and request one or more additional extensions to answer or otherwise plead, thereby delaying this matter even further.

7. Plaintiff does not intend to be unreasonable regarding the extension requested by Mr. Venturella; however, all Defendants should be granted but a single extension based upon Mr. Brown's request.

WHEREFORE, Plaintiff, WRI Palomino Trace Investors, L.P. requests that any order entered by the Court granting an extension of time to answer or otherwise plead apply to all Defendants, and that it provide for no further extensions.

WRI PALOMINO TRACE INVESTORS L.P.

By: /s/ Lauren N. Nachinson
One of Its Attorneys

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